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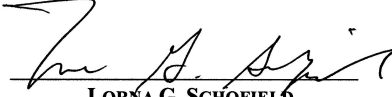
June 29, 2023

ELECTRONICALLY FILED

Application to adjourn trial DENIED.

Dated: June 30, 2023
New York, New York

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 705
New York, NY 10007



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *United States v. Williams*, 22 Cr. 571 (LGS) – Consent Letter Motion to Adjourn Trial Date

Dear Judge Schofield:

We represent the Defendant, Cicero Williams, in the above-captioned matter. We respectfully submit this letter motion, with the consent of the Government, to adjourn the trial date in this matter. This is the second joint motion to adjourn the trial date, the first of which was granted on April 18, 2023, shortly after undersigned counsel was appointed to represent Mr. Williams pursuant to the Criminal Justice Act.

The current scheduling order provides for trial to begin on August 9, 2023, at 9:45 AM. ECF No. 31. On May 25, 2023, the Defense filed a motion to compel discovery, which is pending before the Court. ECF No. 32. Due to the ongoing discovery disputes in this matter, the parties believe that we will need additional time to adequately prepare for trial. Accordingly, we respectfully request that the Court adjourn the trial date until December 2023. The parties have conferred and are available to begin trial between December 1, 2023, and December 15, 2023. If the Court grants the adjournment, we also respectfully request that the Court amend the current scheduling order for pretrial filings and enter new deadlines consistent with the trial date.

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Respectfully submitted,

/s/ Daniel L. Stein

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Cc: Assistant United States Attorneys Marguerite B. Colson and Ni Qian (via ECF)